

1 NAOMI CHUNG (CSBN 283743)
Hickey & Chung, LLP
2 Pier 9, Suite 100
3 San Francisco, CA 94111
4 Telephone: (415) 942-9000
Facsimile: (415) 484-7054
chung@defender.law

HILARY BLAMEY (CSBN 325753)

6 Hickey & Chung, LLP
7 Pier 9, Suite 100
8 San Francisco, CA 94111
9 Telephone: (415) 942-9000
Facsimile: (415) 484-7054
hilary@defender.law

10 Attorneys for Defendant
EDUARDO ALFONSO VIERA-CHIRINOS

FILED

Mar 16 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Case No. CR 19-00367-CRB-1

Plaintiff,

DEFENDANT EDUARDO ALFONSO VIERA-CHIRINOS' ADMINISTRATIVE MOTION TO FILE EXHIBITS 1 AND 3 UNDER SEAL

EDUARDO ALFONSO VIERA-CHIRINOS

Defendant

Defendant

Defendant EDUARDO ALFONSO VIERA-CHIRINOS hereby moves to file under seal Exhibits 1 and 3 referenced in his Motion for Reconsideration of Pretrial Detention Order filed in the above captioned case. Sealing is appropriate as the exhibits contain confidential information.

Specifically, Exhibit 1 consists of Mr. Viera-Chirinos' medical records. Mr. Viera-Chirinos believes disclosure of such confidential health information in this case would cause serious harm to his privacy interest as recognized under HIPAA and related regulations.

Exhibit 3 consist of a wiretap transcript that contains personal identifying information (PII).

Accordingly, Mr. Viera-Chirinos respectfully requests that the Court order Exhibits 1 and 3 referenced in his Motion for Reconsideration of Pretrial Detention Order be filed under seal until further order of the Court.

Respectfully Submitted,

DATED: March 5, 2021

/s/ Hilary Blamey
HILARY BLAMEY
NAOMI CHUNG
Attorneys for Eduardo Viera-Chirinos

1 NAOMI CHUNG (CSBN 283743)
2 Hickey & Chung, LLP
Pier 9, Suite 100
3 San Francisco, CA 94111
Telephone: (415) 942-9000
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UNITED STATES OF AMERICA,

Plaintiff,

v.

EDUARDO ALFONSO VIERA-
CHIRINOS,

Defendant.

FILED

Mar 16 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

I, Hilary Blamey, declare as follows:

1. I am an attorney admitted to practice in the State of California and before the federal
district court for the Northern District of California. I am attorney for defendant Eduardo Viera-
Chirinos in *United States v. Eduardo Viera-Chirinos*, 19-CR-00367-CRB-01 (N.D. Cal). I respectfully

submit this declaration in support of Defendant's Administrative Motion to File Exhibits 1 and 3 under seal as related to Defendant's Motion for Reconsideration of Pretrial Detention Order.

2. Mr. Viera-Chirinos is filing an administrative motion seeking to file Exhibits 1 and 3 under seal. Placeholder documents for Exhibits 1 and 3 will be filed with Mr. Viera-Chirinos' Motion for Reconsideration of Pretrial Detention Order.

3. Exhibit 1 contains Mr. Viera-Chirinos' confidential health information and should therefore be filed under seal in order to protect his privacy interest as recognized under HIPAA and related regulations.

4. Exhibit 3 consists of a wiretap transcript that contains personal identifying information (PII).

I declare under penalty of perjury that the foregoing factual assertions are true and correct to the best of my knowledge and belief.

Executed on March 5, 2021, in San Francisco, California.

/s/ Hilary Blamey
HILARY BLAMEY
Declarant

1 [PROPOSED] ORDER
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For the reasons stated above, the Court orders that Exhibits 1 and 3, to the Defendant Eduardo Viera-Chirinos' Motion for Reconsideration of Pretrial Detention Order, as lodged with this Administrative Motion to Seal, shall be filed under seal until further order of the court.

IT IS SO ORDERED.

Dated: March 16, 2021


HON. THOMAS S. HIXSON
United States Magistrate Judge